

**REMARKS**

Initially, Applicants express appreciation to the Examiner for the detailed Official Action provided. Furthermore, Applicants express appreciation to the Examiner for the acknowledgment of Applicants' Information Disclosure Statement (IDS) filed on December 3, 2008.

Additionally, Applicants' representative James Bonnamy would like to express appreciation to the Examiner for the courtesies extended by the Examiner during the telephone interview of June 26, 2009. During the telephone interview, the distinctions between the present application and U.S. Pat. No. 6,075,899 to Yoshioka (hereinafter "YOSHIOKA") were discussed. Furthermore, claim amendments which would be appropriate in emphasizing the distinctions between the present application and YOSHIOKA were discussed. Specifically, it was discussed and agreed upon that, based on the Examiner's present understanding of YOSHIOKA, the claim amendments as set forth in the present paper would be appropriate in overcoming the outstanding rejection of independent claims 13 and 26 under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA. Additionally, it was also acknowledged by the Examiner that, if the claim amendments as set forth herein were submitted concurrently with a Request for Continued Examination, the claims would not be finally rejected in a first Official Action.

Upon entry of the present paper, claims 13 and 23 will have been amended. The herein-contained amendments should not be considered an indication of Applicants' acquiescence as to the propriety of the outstanding rejection. Rather, Applicants have amended claims 13 and 23 in order to advance prosecution and obtain early allowance of

the claims in the present application. Thus, upon entry of the present paper, claims 13-26 are pending in the present application, with claims 13 and 23 being in independent form.

Applicants address the rejections provided within the Official Action below and respectfully request reconsideration and withdrawal of the outstanding rejections pending in the present application together with an indication of the allowability of claims 13-26 (*i.e.*, all pending claims) in the next Official communication. Such action is respectfully requested and is now believed to be appropriate for at least the reasons provided below.

### **35 U.S.C. § 103 Claim Rejections**

In the outstanding Official Action, claims 13, 14, and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA. Additionally, claim 15 was rejected under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA in view of U.S. Pat. No. 6,745,320 to Mitsuishi (hereinafter “MITSUISHI”). Lastly, claims 16-22 and 24-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA in view of MITSUISHI and further in view of U.S. Pat. No. 6,807,311 to Callway et al. (hereinafter “CALLWAY”).

Initially, Applicants again note that, by the present paper and without acquiescing in the propriety of the outstanding rejections, Applicants have amended claims 13 and 23 (*i.e.*, all pending independent claims) in order to expedite prosecution of the present application. In this regard, Applicants respectfully traverse the outstanding rejections.

With respect to amended independent claim 13, Applicants respectfully submit that YOSHIOKA fails to render obvious at least an information processing device wherein the address conversion unit is operable to convert access addresses, so that a column address of data at a (K+m)th column, where K and m are positive integers and

$m \leq M$ , of an  $L$ th line, and a column address of data at a  $K$ th column of an  $(L+n)$ th line, where  $L$  and  $n$  are positive integers and  $n \leq N$ , become successive, and wherein  $n=2n'$  and  $n'$  is a positive integer.

Furthermore, with respect to independent claim 23, Applicants submit that YOSHIOKA fails to render obvious at least a data access method including converting access addresses wherein the addresses are converted so that a column address of data at the  $(K+m)$ th column, where  $K$  and  $m$  are positive integers and  $m \leq M$ , of the  $L$ th line, and a column address of the data at the  $K$ th column of the  $(L+n)$  line, where  $L$  and  $n$  are positive integers and  $n \leq N$ , become successive, and wherein  $n=2n'$  and  $n'$  is a positive integer.

According to the above-mentioned features, a column address of an  $L$ th line and an  $(L+n)$ th line (*i.e.*, an  $(L+2n')$ th line) become successive. In this regard, since  $n'$  is a positive integer, an  $L$ th line and an  $(L+1)$ th line are not successive. For example, where  $n'=1$ , the column address of the  $L$ th line and the  $(L+2)$ th line become successive. In other words, in the non-limiting example described above, the column addresses of every other line become successive. As a result, when the field is estimated, such as in motion compensation or motion estimation processing for an interlaced video, the unnecessary transfer load is reduced and the effective bandwidth is improved in a short burst-length access such as a rectangular access. Such an example is shown in Figure 6 of the present application. Furthermore, according to the above-mentioned features, wherein the addresses of every  $(n)$ th line (*i.e.*,  $(2n')$ th line) become successive column addresses, there is the non-limiting and advantageous effect that high-speed reading can be

performed by avoiding a wasteful transfer (*i.e.*, by skipping every second, fourth, or sixth line in a column).

Contrary to the present application, Applicants submit that YOSHIOKA merely discloses an image memory wherein blue chrominance components of an image are stored in even-numbered addresses and wherein red chrominance components of the image are stored in odd-numbered addresses (*see* YOSHIOKA, col.16, lns. 33-41). In other words, the blue chrominance components and red chrominance components of a pixel block are stored next to each other in the same page using the even-numbered columns and odd-numbered columns, respectively (*see* YOSHIOKA, col. 16, lns. 53-57). Therefore, according to YOSHIOKA, the blue chrominance components and the red chrominance components included in the pixel block can be read in a single burst read (*see* YOSHIOKA, col. 16, lns. 62-64).

In this regard, Applicants submit that YOSHIOKA cannot reasonably be found to render obvious an address conversion unit, as recited by independent claim 13, that is operable to convert access addresses so that a column address of data at the (K+m)th column of an Lth line and a column address of data at a Kth column of an (L+n)th line become successive where  $n=2n'$  and  $n'$  is a positive integer. Furthermore, YOSHIOKA cannot reasonably be found to render obvious converting access addresses, as recited by independent claim 23, wherein the addresses are converted so that a column address of data at the (K+m)th column of the Lth line and a column address of the data at the Kth column of the (L+n)th line become successive where  $n=2n'$  and  $n'$  is a positive integer. To the contrary, Figure 9 of YOSHIOKA discloses that the column address of pixel Y(15,0) (*i.e.*, “000000\_1111”) and the column address of pixel Y(0,1) (*i.e.*,

“000001\_0000”) are successive. In other words, YOSHIOKA merely discloses the column address of data at a (K+m)th column of an Lth line and a column address of data at the Kth column of an (L+1)th line as being successive. Therefore, according to YOSHIOKA, unnecessary transfer loads occur in the rectangular access when the field is estimated, such as in motion compensation or motion estimation processing for an interlaced video, and thus the advantage of reducing unnecessary transfer loads cannot be obtained.

Applicants further submit that MITSUISHI and CALLWAY each fail to disclose or suggest that which is lacking in YOSHIOKA. Specifically, Applicants submit that these references fail to disclose or render obvious at least the address conversion unit, as recited by independent claim 13, and the converting access addresses, as recited by independent claim 23. Accordingly, Applicants submit that even if one attempted to combine MITSUISHI and CALLWAY in the manner suggested by the Examiner, one would not arrive at the information processing device or data access method as recited by independent claims 13 and 23, respectively. Accordingly, the Examiner is respectfully requested to withdraw the 35 U.S.C. §103 rejections of claims 13 and 23.

With respect to the Examiner’s rejection of dependent claims 14-22 and 24-26, Applicants submit that these claims are all directly or indirectly dependent from one of allowable independent claims 13 and 23, which are allowable for at least the reasons discussed *supra*. Thus, these dependent claims are submitted to also be allowable for at least the reasons discussed *supra*. Furthermore, all dependent claims recite additional features which further define the present invention over the references of record..

At least for the reasons set forth above, Applicants respectfully submit that each and every pending claim of the present application (*i.e.*, claims 13-26) meets the requirements for Patentability at least under 35 U.S.C. § 103, and respectfully request the Examiner to indicate the allowance of each and every pending claim in the present application.

**CONCLUSION**

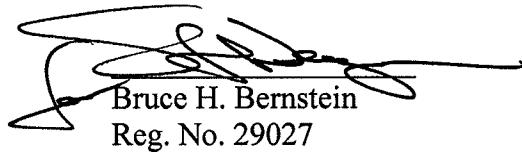
In view of the fact that none of the art of record, whether considered alone, or in any proper combination thereof, discloses or renders obvious the present invention as now defined by the pending claims, and in further view of the above amendments and remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Applicants note that this amendment is being made to advance prosecution of the application to allowance, and should not be considered as surrendering equivalents of the territory between the claims prior to the present amendment and the amended claims. Further, no acquiescence as to the propriety of the Examiner's rejection is made by the present amendment. All amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Commissioner determine that an extension of time is required in order to render this response timely and/or complete, a formal request for an extension of time, under 37 C.F.R. §1.136(a), is herewith made in an amount equal to the time period required to render this response timely and/or complete. The Commissioner is authorized to charge any required extension of time fee under 37 C.F.R. §1.17 to Deposit Account No. 19-0089.

If there should be any questions concerning this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,  
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